UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Honeywell International, Inc.
2768 N. US 45 Road
Metropolis, Illinois 62960

ATTENTION:

Sean Chisek
Environmental Manager
Sean.chisek@honeywell.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Honeywell International, Inc. (Honeywell or you) to submit certain information. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Regional Administrator, who has redelegated the authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Honeywell owns and operates a uranium hexafluoride manufacturing facility in Metropolis, Illinois, which has chemicals that are manufactured, used, stored, or otherwise handled, and are regulated under Section 112(r) of the CAA. We are requesting this information

to determine whether Honeywell is complying with the requirements of Section 112(r) of the CAA and the regulations implementing Section 112(r) at 40 C.F.R. Part 68.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Honeywell to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Veronica Fischer at fischer.veronica@epa.gov or 312-353-5685 to make arrangements to submit your response.

Honeywell must submit all required information under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Honeywell to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Veronica Fischer at fischer.veronica@epa.gov or at (312) 353-5685.

MICHAEL HARRIS Digitally signed by MICHAEL HARRIS
Date: 2023.01.18 10:45:12 -06'00'

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.

2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.

3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.

4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.

5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.

6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.

4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.

5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.

6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 et seq., or the Chemical Accident Prevention Provisions at 40 C.F.R. Part 68.

1. "Facility" shall mean Honeywell's uranium hexafluoride manufacturing facility located at 2768 N. US 45 Road, Metropolis, Illinois 62960.

Appendix B

Information You Are Required to Submit to EPA

Honeywell must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days from date of receipt of this information request:

General Requests

1. Provide the following corporate information:
   a. Headquarters location;
   b. Corporate structure;
   c. Corporate officers' names and titles;
   d. Incorporation date and location;
   e. Annual sales; and
   f. Facility locations.

2. Provide the following information on the Facility:
   a. Facility ownership/tenant history;
   b. Date on which operations began;
   c. Facility size;
   d. Operating shifts;
   e. Number of people employed;
   f. Facility owner/tenant information;
   g. Facility operation and manufacturing process descriptions;
   h. NAICS codes;
   i. If facility is a responding stationary source, include the emergency response;
   j. Refinery organization charts including risk management program (RMP) responsibilities.

3. Provide the current Title V Permit(s) for the Facility.

4. Provide a list of all CERCLA section 103 and EPCRA 304 reportable releases under Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act or Section 304 of the Emergency Planning and Community Right-To Know Act from January 1, 2016 to present. For each release listed, provide the date and time the release began and ended, the identity of the chemical released, and the process the release originated from, the quantity of hazardous substance released in pounds, the root cause, and the corrective actions taken.

5. Provide a list of all process units at the Facility.

6. Provide a list of all RMP-covered processes at the Facility. For each such process, indicate the program level and include the block flow diagram(s).

7. Provide plot/site plans for the Facility, including the flare system.

8. Submit a copy of the management system developed to comply with 40 C.F.R. § 68.15. Include an organizational chart or similar document defining the structure and responsibility for implementation of each requirement of the RMP program.

9. Provide the five-year accident history records for the Facility as defined in 40 C.F.R. § 68.42. For each release involving any of regulated toxic and/or flammable substances listed in Tables 1, 2, 3, and 4 of 40 C.F.R. § 68.130, please provide the following:

    a. The date and time of release;
    b. The chemical(s) released;
    c. The amount and duration of release;
    d. Piping and instrumentation diagrams, with keys/legends, for the process in which the release occurred;
    e. On-site and offsite impacts;

10. Provide a list of incident reports/investigations for all incidents which resulted in, or could reasonably have resulted in (near misses), a catastrophic release of a regulated substance over the last 5 years. Also include the incident investigation report from the October 2012 incident in the Delayed Coking covered process.

11. Provide the emergency response plan used at the Facility.

12. Provide records that demonstrate the coordination of your emergency response program with local responders.

13. Provide a demonstration of the site security and access restriction.

14. Provide written procedure(s) for managing hot work including any referenced attachments.

15. Provide written procedure(s) for the mechanical integrity program.

16. Provide written procedure(s) for the process hazard analysis (PHA) program.

17. Provide written procedure(s) for management of changes, as defined at 40 C.F.R. § 68.75(a) including any referenced attachments.

18. Provide written procedure(s) for conducting a pre-startup review.

19. Provide procedures for developing, reviewing, approving, and certifying operating procedures.

20. Provide documentation of when the two most recent RMP compliance audits were completed and provide copies of the two most recent RMP compliance audit reports.

21. Provide documentation of compliance audit recommendation tracking and resolution.

22. Provide the employee participation plan and a list of labor unions representing hourly employees at the facility.

23. Provide the facility contractor policy describing how safety performance and programs are evaluated when selecting a contractor, work practices that control the entrance/exit or presence of contractors, and documentation on how applicable provisions of the emergency response program are explained to contractors.

24. Provide a list of refinery process units with capacities and indicate whether each unit is currently in operation.

25. Provide a list of all shutdown/start-ups since January 1, 2018, including the dates and reasons for each shutdown.

For each Program 3 process, provide the following information:

26. Provide a list of all substances/chemicals and quantities associated with each process.

27. Submit a detailed process flow diagram for each process.

28. Submit piping & instrumentation diagrams (P&IDs) for the process.

29. Submit electrical classification drawings for the process.

30. Provide a copy of the alarm prioritization policy/program.

31. Provide a list of the following equipment associated with the process:

    a. Piping systems (including piping components such as valves);
    b. Emergency shutdown systems;
    c. Controls (including monitoring devices and sensors, alarms, and interlocks);
    d. Pumps; and
    e. Flare systems.

32. Provide the following process safety information:

    a. Material safety data sheets (MSDS) for chemicals used in the process;
    b. Process narrative descriptions;
    c. Process chemistry;
    d. Chemical reactivity matrix;
    e. Maximum intended inventory of chemicals (include vessel size and maximum chemical inventory for each piece of equipment);
    f. Upper and lower limits defined for the process;
    g. Consequences of deviation;
    h. Materials of construction for major equipment;
    i. Codes and standards used to design and maintain the process;
    j. Material and energy balances for the process;
    k. Relief systems and their design basis;
    l. Ventilation system designs;
    m. Safety systems and their functions.

33. Submit documentation of when PHAs have been conducted for the process and when the next PHA will be completed.

34. Submit the two most recent, complete PHAs performed for the process. Include a list of the findings/recommendations and provide documentation for the tracking and resolution of the findings/recommendations. Include a list of all open action items from the PHA, the individual to whom the action item is assigned to, a time frame for when the action item will be completed, and reasons for why the action item has not yet been completed.

35. Submit copies of the most current operating procedures developed and implemented for the process.

36. Provide documentation of annual certifications of all operating procedures associated with the process.

37. Submit a list of all employees that currently operate systems for the process. Additionally, include current training documentation, for initial and refresher training, of the process in accordance with 40 C.F.R. § 68.71(c).

38. Provide a list of all inspection/testing procedures used for all process equipment defined in 40 C.F.R. § 68.73(a).

39. Provide the following documentation regarding inspections, testing, and repairs of process equipment (as defined in 40 C.F.R. § 68.73(a)):

a. List of all pressure vessels including identification numbers, function/use or service, age of the vessel, date of last inspection and type of inspection (e.g., API 510 visual, API 570, non-destructive evaluation).
b. List of all equipment on a Risk-Based Inspection plan.
c. List of all equipment currently overdue for inspection or testing.
d. List of all pressure relief valves, type, sizing, date of installation and date when inspection or replacement is expected.

40. Provide a list of changes made to the process that required use of the Facility's management of change (MOC) policy/procedure since the last five-year regulatory PHA associated with each covered process.

41. Provide a list of all clamps or temporary leak repairs installed in each process and the associated flare system(s). Include for each clamp or temporary leak repair the installation date, associated MOC number or reference, and reason for installation.

42. Provide a list of pre-startup safety reviews associated with the list of MOCs.

43. Provide the worst-case release scenario analysis (including off-site impacts) performed for the process in accordance with 40 C.F.R. § 68.25.

44. Provide alternative release scenario analyses (including off-site impacts) for the process in accordance with 40 C.F.R. § 68.28.

45. Provide the offsite consequence analysis developed for the process in accordance with 40 C.F.R. § 68.22 if it was not provided in requests 43 and 44.